

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

PHI ACQUISITIONS NSA

Docket No. MC2014-21

PHI ACQUISITIONS NSA

Docket No. R2014-6

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE MOTION FOR  
EXTENSION OF COMMENT DEADLINES**  
(April 3, 2014)

The United States Postal Service hereby provides its response to the Public Representative's Motion for Extension of Comment Deadlines (hereinafter "Motion"), filed March 27, 2014.<sup>1</sup> In that Motion, the Public Representative requests that the Commission establish a deadline for initial comments that is two days after the date on which the Postal Service submits a complete response to Chairman's Information Request (CHIR) Nos. 1 and 2. The Motion further requests a deadline for reply comments that is nine days after the Postal Service files complete responses to CHIR Nos. 1 and 2.

The Postal Service does not oppose the Public Representative's Motion. The adjustments to the comment periods outlined in the Motion are reasonable. The Postal Service continues to work on preparing the outstanding CHIR responses and expects to file all outstanding responses tomorrow. Nevertheless, the Postal Service would like to

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<sup>1</sup> Public Representative's Answer to Postal Service Motion for Late Acceptance and Motion for Extension of Comment Deadlines, Docket Nos. MC2014-21 and R2014-6, March 27, 2014.

emphasize the importance of an expedient resolution of the instant docket for both the Postal Service and its contract partner, PHI Acquisitions, Inc. (PHI). As outlined in PHI's response to Question 2 of CHIR No. 1,<sup>2</sup> PHI needs sufficient lead time for several key activities and investments in order to implement this NSA. These activities cannot begin prior to regulatory approval of the NSA. Therefore, while the Postal Service does not oppose the Public Representative's Motion, it would be opposed to any additional delays in the ultimate disposition of this case.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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<sup>2</sup> Response of PHI Acquisitions Inc. to Chairman's Information Request No. 1, March 27, 2014.